

LAW OFFICES OF ARTHUR R. SIEGEL



ARTHUR R. SIEGEL
351 CALIFORNIA STREET
SUITE 700
SAN FRANCISCO
CA 94104
ASIEGEL@IGC.ORG
FAX 395-9615
415/ 395-9335

June 11, 2008

Michael C. Cohen via email MCohen@cohenlegalfirm.com
Law Offices of Michael C. Cohen
1814 Franklin Street, Suite 900
Oakland, CA 94612

Paul Joseph Bauer via email PBauer@daklaw.com
Michael J. Hogan via email MHogan@daklaw.com
Dowling, Aaron & Keeler
8080 North Palm Avenue, Third Floor
Fresno, CA 93711-5797

Re: Lakesha Ware v. International Paper Co.
United States District Court Case No. 08-01187 WDB MED

Dear Counsel:

This will confirm that we have scheduled the mediation in this case for August 28, 2008. We will meet at my offices at 351 California Street, Suite 700, San Francisco, beginning at 10:00 a.m. We agreed to keep the whole day available to allow the mediation to continue as long as it is being productive.

Please make sure that the written statements described in ADR L.R. 6-7 are exchanged and in my office by August 25, 2008. Email is preferable. Please include any key documents you feel I should read. If you think it would be helpful to our mediation, I also invite you to submit to me - but not exchange - confidential statements relating, for example, to obstacles to or options for settlement.

Also, please remember to arrange for your clients' attendance. As we discussed, apart from counsel, plaintiff will appear, as will Jessica Neal, in house counsel for defendant.

Please prepare for the mediation by discussing each of the following items with your clients:

- clients' interests, not just positions, and how these interests could be met;
- other side's interests, and how these could be met;
- best and worst alternatives to a negotiated settlement;
- strengths and weaknesses of case; and
- estimated budget to litigate the case through trial.

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As we discussed, under ADR L.R. 6-3(b) I will donate my preparation time and the first four hours of the mediation. If the case has not resolved and you all agree to continue, I will charge the court-set rate of \$200.00 per hour for the next four hours. After eight hours of session time, I will charge my hourly rate of \$400.00.

I look forward to seeing you on August 28th.

Very truly yours,

Arthur R. Siegel

cc: Clerk's Office-ADR Unit
Via email Alice_Fiel@cand.uscourts.gov
ARS:tr